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## RELIANCE TRAILER CO., LLC

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NTTSA 02-12150-44

January 29, 2003

Mr. Taylor Vinson  
Office of Chief Counsel  
U.S. Department of Transportation  
N. H. T. S. A.  
400 Seventh Street, S.W.  
Washington, D.C. 20590

CONFIDENTIAL  
JAN 30 2003

Re: Petition Request for TREAD Act Data Submission CONFIDENTIALITY

Dear Mr. Vinson:

Reliance Trailers is a small manufacturer of truck trailers (500-1500 per year). We manufacture flatbeds, container chassis, vans, refuse trailers, converter dollies, wood chip trailers, and end dump, transfer and pony dump trailers. Due to the small quantity of each of these trailer types manufactured each year, the submission of production, warranty and consumer complaint information quarterly, will provide our competitors with a ready made data base outlining our sales and production volumes. Since we have only a few competitors for each of these trailer types, this will give them very valuable competitive information.

Prior to implementation of this rule, manufacturer specific information was only available in trailer type aggregate form.

The performance problems we have regarding our products are very, very rare and seldom involve multiple units, unless they involve supplier provided products, since we custom design our units to specific customer requirements. Most of our orders are for from (1) to (10) units. We average about (2.8) units per order.

Many of our competitors won't have to file this data because they fall below the 500 unit/year threshold. Thereby, we're competitively disadvantaged. We understand that formal recall information can be valuable to the public and is expected to be readily available, but production, complaint and warranty information can provide data to competitors to be used against us.

Therefore, we respectfully request that the Early Warning information we provide under the Tread Act be held in confidence.

Please call me if you have questions, or need further information.

RELIANCE TRAILER CO., LLC.

Greg Kreshel, P.E.  
Director, Research, Development  
and Governmental Compliance

